

Byz Cable, Inc.

30 West Main Street CROSBY, MINNESOTA 56441 Telephone 218/546-6225 RECEIVED

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PETITION FOR STAY MM DOCKET 92-266

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+DERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

June 10, 1993

Ms. Donna Searcy Secretary Federal Communications Commission 1919 M Street N. W. Washington, DC 20554

Dear Ms. Searcy:

We are asking for a delay in implementing the effective date of the Commission's rate regulations.

Being a small system with 1500 subscribers serving 5 cities and 6 townships we are finding the regulations confusing and difficult to understand. Eighteen years ago with 250 subscribers we started expanding into the rural areas adding 2-4 miles of cable plant each year. Today, we have 65 miles of plant at a density of 23 subs per mile. Located 130 miles from any major broadcast stations forces us to microwave 4 channels to our area as we cannot receive quality pictures off-air. Because of these conditions, we need to be able to calculate cost-of-service. I am the owner, lawyer, accountant, technician and office boy. We do not have a staff of accountants and lawyers to rely on to

know what are employees are doing and I don't need this overhead in our size of system.

We are a small system with a total of 4 employees, with 65 miles of plant in a rural area with a density of 23 subs per mile. Constant repair and maintenance is required to have quality pictures to the subscribers. This work should take precedence. Our ultimate goal should be to serve the subscriber not fill in forms.

I have spent the last week in the office trying to decipher the new rules and I'm more confused now than ever. Before we can make decisions we need to know the requirements for cost-of-service.

Sincerely yours,

Conrad A. Bye